

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Louis Agre, William Ewing,
Floyd Montgomery, Joy Montgomery,
and Rayman Solomon,

Plaintiffs,

v.

Thomas W. Wolf, Governor of Pennsylvania,
Pedro Cortes, Secretary of State of
Pennsylvania, and Jonathan Marks,
Commissioner of the Bureau of Elections,
in their official capacities,

Defendants.

and

Michael Turzai, Speaker of the Pennsylvania
House, and Joseph Scarnati, President
Pro Tem of the Pennsylvania Senate, in their
Official capacities

Defendant-Intervenors

Civil Action No. 17-4392

MOTION FOR SANCTIONS PURSUANT TO FED. R. CIV. P. 37(b)(2)

Pursuant to Rule 37(b)(2) of the Federal Rules of Civil Procedure, Plaintiffs hereby request that the Court grant their motion for sanctions against Legislative Defendant Michael C. Turzai, in his official capacity as Speaker of the Pennsylvania House of Representatives (Speaker Turzai) and Joseph Scarnati, President Pro Tem of the Pennsylvania Senate, in his official capacity (Sen. Scarnati)(collectively, “Legislative Defendants”) for failure to comply with the Orders of this Court of November 22, 2017

(ECF Doc 114) and November 28, 2017 ECF Doc.144), as set forth in the accompanying Brief and proposed Form of Order.

Respectfully submitted,

HARDWICK BENFER, LLC

BY: /s/Virginia L. Hardwick

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